

United States District Court	DISTRICT of ARIZONA
United States of America v. Julio Cesar Aguirre DOB: 1982; Citizen of Mexico.	DOCKET NO. MAGISTRATE'S CASE NO. 25-06320MJ
Complaint for violations of Title 18, United States Code, Sections §§ 2119, 924(c)(1)(A)(iii), and 922(g)(5)(A) and 924(a)(8).	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: COUNT 1: On or about June 30, 2025, at or near Tucson, in the District of Arizona, the defendant, JULIO CESAR AGUIRRE , with the intent to cause death and serious bodily harm, attempted to take a motor vehicle that has been transported, shipped, or received in interstate or foreign commerce from the person or presence of another by force and violence or by intimidation. All in violation of Title 18, United States Code, Section 2119. COUNT 2: On or about June 30, 2025, at or near Tucson, AZ, in the District of Arizona, the defendant, JULIO CESAR AGUIRRE , did knowingly use, carry, and discharge a firearm during and in relation to, and possessed a firearm in furtherance of, a crime of violence, that is, carjacking, a felony crime prosecutable in a Court of the United States. All in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii). COUNT 3: On or about June 30, 2025, at or near Tucson, AZ, in the District of Arizona, the defendant, JULIO CESAR AGUIRRE , knowing he was an alien illegally or unlawfully in the United States, did knowingly possess a firearm, in and affecting interstate and foreign commerce, to wit: one (1) Smith & Wesson, M&P 2.0, 9mm caliber pistol. All in violation of Title 18, United States Code, §§ 922(g)(5)(A) and 924(a)(8).	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: According to Tucson Police Department ("TPD") case P2506300026, on or about June 30, 2025, at approximately 6:28 a.m., TPD officers responded to a burglary call at a residence in the 3300 block of E. 27 th Street in Tucson, Arizona. When officers arrived, they encountered the victim resident ("Witness 1") who told officers he and his wife were asleep when they heard a window break in their bathroom. When Witness 1 entered the bathroom and looked out the window, he observed a subject described as a white male, approximately 5'6" to 5'7", thin build, wearing tan pants and a blue and white striped collared shirt. The subject had short black hair and was carrying a backpack. When Witness 1 spoke to the subject, the subject pulled a black pistol from his waistband and pointed it at Witness 1. Witness 1 initially retreated from his bathroom, waited a few minutes, and checked outside, no longer seeing the subject. At approximately 6:47 a.m., TPD received a call regarding a person shot at a parking lot located in the 2100 block of S. Winstel in Tucson, Arizona. When officers arrived, they found a white male victim ("Victim 1") with a gunshot wound to his upper left chest area in the driver's seat of a red Toyota Tundra bearing Arizona license plate YTA81F. Victim 1 died of his injuries. Investigators observed blood outside the truck, and one spent 9mm cartridge casing just outside the driver's side of the truck as well as two live 9mm rounds next to the spent casing. (BASIS OF COMPLAINT CONTINUED ON REVERSE.)	
MATERIAL WITNESSES IN RELATION TO THE CHARGE: N/A	
DETENTION REQUESTED Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. AUTHORIZED BY AUSA <i>A. Rossi</i> Sworn to telephonically.	SIGNATURE OF COMPLAINANT (official title) STEVEN MOLESKY Digitally signed by STEVEN MOLESKY Date: 2025.07.02 12:26:58 -07'00' OFFICIAL TITLE Special Agent Steven Molesky, FBI
SIGNATURE OF MAGISTRATE JUDGE¹⁾ <i>Synnette C. Hymie</i>	DATE July 2, 2025

1) See Federal rules of Criminal Procedure Rules 3, 4.1 and 54

(BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED CONTINUED.)**Page 2 of 3.**

Investigators interviewed several witnesses to the carjacking and shooting. Witness 2 told investigators she was going to work when she observed Victim 1 inside his truck and a Hispanic male subject standing outside the vehicle. Witness 2 saw the subject holding a gun and said to him not to ruin his life. The subject responded that he had already ruined his life and then shot Victim 1. Witness 2 ran back into her apartment. Another resident, Witness 3, was outside when she heard the subject demand Victim 1 give him the keys to his vehicle. Witness 3 heard the subject tell Victim 1 he was "going to shoot you on the count of three if you don't give me the keys." Witness 3 observed the subject count to 3 and then shoot Victim 1. Witness 3 described the subject as a Hispanic male, approximately 5'11", medium build, short hair, and a tattoo on his midsection area. Lastly, Witness 4 was outside watering her plants when she heard Victim 1 say "Don't do that." Witness 4 looked and saw a male subject standing at Victim 1's truck telling Victim 1 he needed Victim 1's car to help his mother. The subject looked at Witness 4 and pointed his gun at her. Witness 4 began spraying water on the subject, and when he turned, she ran into her apartment. She then heard a gunshot.

At approximately 7:13 a.m., TPD received a call from a residence located in the 3700 block of E. 33rd Street in Tucson, Arizona, in reference to a burglary. When officers arrived, the victim resident ("Witness 5") told officers he was in his backyard when a subject entered the yard and told Witness 5 he needed a car for his mother. Witness 6, who is the spouse of Witness 5 and was also in the backyard, noticed the subject was bleeding and attempted to apply a tourniquet to his arm. The subject pointed a gun at Witness 5 and reiterated he needed a car. The subject entered the residence with Witnesses 5 and 6 and continued to demand their car. Eventually the subject placed the gun to his head and talked about killing himself. Witnesses 5 and 6 were able to exit the residence and encountered officers, who entered the residence to rescue a potential hostage who was still inside the residence, but the subject had fled already. Witnesses 5 and 6 described the subject as a Hispanic male, with no shirt, bleeding from the arm, having a tattoo on his stomach, with a slim build and shaggy hair.

Subsequently, investigators observed a blood trail which started outside the truck and led northwest out of the parking lot. The blood trail continued southbound on the sidewalk, crossed S. Winstel and continued westbound down the alleyway between 33rd Street and Shepherd Place. The blood trail continued west through the alleyway up to the rear of a residence in the 3700 block of E. Shephard, approximately 40 yards to the east of the residence of Witnesses 5 and 6.

While investigators were on scene at the residence of Witnesses 5 and 6, Witness 7 approached them and reported a naked male just ran west in the north alleyway of 33rd Street. Witness 7 reported the man crossed Dodge Boulevard and continued to flee westbound. TPD officers set up a containment area and searched for the subject within that area. TPD officers located the subject, later identified as **JULIO CESAR AGUIRRE ("AGUIRRE")**, hiding in a storage shed inside the yard of a residence located in the 2100 block of S. Richey Boulevard in Tucson, Arizona. On one of the shelves of the storage shed, within reach of **AGUIRRE**, was a black Smith & Wesson, M&P 2.0, 9mm caliber pistol, bearing serial number NDN5223 with what appeared to be blood on it. An ATF nexus expert was contacted and gave a preliminary finding that the firearm traveled in or affected interstate commerce. During the arrest, **AGUIRRE** had been bitten on the upper left leg by a TPD K9 officer. **AGUIRRE** was transported to the hospital to treat his injuries. Paramedics told investigators that prior to treating him, **AGUIRRE** told the paramedics his name was "Julio Aguirre." While at the hospital, **AGUIRRE** volunteered to a TPD officer that he was sorry for all the things he did and that his life was already over.

(BASIS OF COMPLAINT CONTINUED ON NEXT PAGE.)

(BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED CONTINUED.)
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Subsequent records checks revealed **AGUIRRE** was on parole and did not have an Arizona Driver's License. On the parole return, there were some descriptors that appeared to match **AGUIRRE**, including a tattoo on his abdomen. A visual comparison of **AGUIRRE**'s tattoo matched the tattoo in the parole return. In addition, **AGUIRRE**'s criminal history reveals **AGUIRRE** was arrested at least 12 times between 2007 and 2013 for illegal entry or alien admissibility crimes. A search of United States Homeland Security Investigations records revealed **AGUIRRE** is a Mexican Citizen, had a Final Order of Removal and was removed from the United States on March 8, 2013, and was deported via the Nogales, AZ, port of entry.